



Environmental  
Quality Board

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COMMONWEALTH OF PUERTO RICO / OFFICE OF THE

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Files

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August 15, 1986

MEMORANDUM

TO : Mr. Carlos R. Vázquez Ayala  
Director  
Land Pollution Control Area

THROUGH : Yazmín López  
Acting Director  
Hazardous Waste Division

: Ivette De Jesús, Chief  
Inspection, Monitoring and  
Surveillance Section

FROM : Damaris Maldonado Viñas *DM*  
Environmental Inspector

SUBJECT : ELI LILLY INDUSTRIES, INC.  
MAYAGUEZ - PRD 091024786

The above mentioned facility was visited on June 30, 1986, with the purpose of performing a Full RCRA Generator and TSD Facility Inspection.

The following documents related to this inspection are enclosed:

- Inspection Report
- Notification to the industry
- RCRA Generator and TSD Inspection Form
- Copy of Part "A" Permit Application

RCRA INSPECTION REPORT

Report Prepared for:

Eli Lilly Industries, Inc.

Location:

Road No. 2 Km. 146  
Sabanetas  
Mayaguez, Puerto Rico

Mailing Address:

P. O. Box 1748  
Mayaguez, Puerto Rico 00708

Telephone:

(809) 834-7846

Type of Inspection:

A full RCRA inspection was conducted to Eli Lilly Industries, Inc. as Generator and TSD Facility.

E.P.A. I.D. Number:

PRD 091024786

Date of Inspection:

June 30, 1986

Participating Personnel:

Mr. José J. Rivera - Eng. Manager.

Mr. Gabriel García - Project Eng.

E.Q.B. or E.P.A. Personnel:

Damaris Maldonado Viñas

Report Prepared by:

Damaris Maldonado Viñas  
Environmental Inspector

Company's type of process:

Eli Lilly Ind., Inc., produce pharmaceuticals products such as: Darvon, Ilosone, Acetohexamide and Cephalixin.

Process where the HW are generated:

The hazardous wastes are generated from the distillations extractions, separations and drying processes.

GENERATOR STANDARDS

Subpart A - General

262.11/702 B (1) - Hazardous Waste Determination

To determine that the wastes are hazardous, the company used the following methods:

- Acetone, Toluene, Spent Solvent - These wastes are listed in the regulation as hazardous waste, with hazardous waste number F002.
- Ethyl Acetate, Ethyl Ether - These wastes are listed in the regulation as hazardous wastes with hazardous waste number F003.
- Toluene - This waste is listed in the regulation as a hazardous wastes with hazardous waste number F005.
- Alcohols and Hexane - Exhibit Ignitability characteristic (D001).
- Piridine - Toxic waste with hazardous waste number D004.
- Chromium - With hazardous waste number D007.
- Lead - With hazardous waste number D008.
- Mercury - With hazardous waste number D009.
- Selenium - With hazardous waste number D010.
- Silver - With hazardous waste number D011.
- Phosphoric Acid - Corrosive waste with hazardous waste number D002.

262.12/702 C (1) (2) - EPA Identification Numbers

EPA assigned the following identification number: PRD 091024786.

Subpart B - The Manifest

262.20 - 262.23/703 - General Requirements and Use

Eli Lilly Ind., Inc., has record of all manifests sent by Eli Lilly of Carolina, Puerto Rico for wastes incinerated.

Subpart C - Pre-Transport Requirements

262.30 - 262.33/704 (A) (B) (C) - Packaging, Labeling, Marking, Placarding

Eli Lilly Indc., Inc., received all the steel containers of 55 gallons with the labels in accordance with applicable Department of Transportation regulation. The containers were marked with "Hazardous Wastes" Label.

262.34/704 (D) - Accumulation Time

Eli Lilly Ind., Inc. accumulates hazardous waste for more than 90 days, therefore, it is an operator of a storage facility.

Subpart D - Record Keeping and Reporting

262.40/504 A (1) (2) - Recordkeeping

Eli Lilly Ind., Inc., keep a copy of each manifest signed since 1981.

262.41/503 A - Annual Report

Eli Lilly Ind., Inc., submitted the annual report to the Environmental Quality Board on March 3, 1986. They have records premium annual reports.

262.41/504 B - Exception Reporting

Eli Lilly did not have to submit and Exception repor at this time.

TSD FACILITY STANDARDS

Subpart B - General

265.13/807 I - Waste Analysis

The waste analysis plan specifies the test methods, sampling methods, frequency of analysis and parameters to be used for analysis.

265.14/803 D - Security

Eli Lilly Ind., Inc., maintains an effective surveillance program 24 hours per day. This facility has a barrier fence to control entry. The gate is operated by remote control from a guard house.

Three (3) signs with the legend "Danger Unauthorized Personnel Keep Out" both in English and Spanish are posted at the storage area although these signs were found deteriorated.

## 265.15/803 F - General Inspection Requirements

Eli Lilly Ind., Inc., has a written inspection schedule which identifies the items to be inspected and the frequency of inspection. It also identifies the types of problem which may be prevalent during the inspection. Eli Lilly, Ind., Inc., records all inspections in a weekly inspection log which includes date, time of the inspection, the name of the inspector and comments for any remedial action inspection. In general Eli Lilly Ind., Inc., meet the general inspection requirements specified in 265.15/803 F.

## PERSONNEL TRAINING

### 265.16/808 (B) (C) - Personnel Training

Record review reveals that Eli Lilly Ind., Inc., personnel completed classroom instruction and on the job training within six (6) months of being employed. Eli Lilly, Ind., Inc., maintain written documentation of job title for each position, the name of the employee filling each job type received by personnel. These records are kept in the facility but no written evidence of the content of training was shown. Therefore, Eli Lilly, Ind., Inc., does not meet the require information specified in 265.16/808 C.

### Subpart C - Preparedness and Prevention

#### 265.31/810 B - Maintenance and Operation of Facility

In general Eli Lilly Ind., Inc., is maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non sudden release of hazardous waste.

#### 265.32/810 C - Required Equipment

Eli Lilly Ind., Inc., has internal alarm system, telephones, walkie talkies for the personnel and fire extinguishers near to the storage area. Water at adequate volume and pressure to supply water hose streams was available.

#### 265.33/810 D - Tasting and Maintenance of Equipment

All the available emergency equipment is listed and maintained weekly to assure its operation in time of emergency.

#### 265.34/810 E - Access to Communications or Alarm System

The personnel involved in the operation of HW activities have immediate access to an emergency communication device such as telephone.

265.35/810 F - Required Aisle Space

Eli Lilly Ind., Inc., facility maintains adequate aisle space to allow the unobstructed movement of personnel in the storage area.

267.37/810 G - Arrangements with Local Authorities

Evidence of arrangements with local authorities were not shown. Therefore, the company was found in violation to this section.

Subpart E - Manifest System, Recordkeeping and Reporting

265.71/540 A - Use of Manifest System

Eli Lilly Industries, Inc., has copies of Manifests of all hazardous waste received in their facility. These were evaluated and found that contain all the information concerning the manifest system.

265.72/504 (D) - Manifest Discrepancies

Manifest discrepancies had not happened.

265.73/502 (C) - Operating Records

Eli Lilly Ind., Inc., keep daily record of all operations. These records provide a description of type and quantity of each hazardous waste stored at the facility.

265.74/505 (B) (C) (D) - Availability, Retention, and Disposition of Records

All records were available at the time of inspection.

265.75/503 A - Annual Report

Eli Lilly Ind., Inc., keep record of annual reports.

Subpart D - Contingency Plan and Emergency Procedures

265.52/207 - Content of Contingency Plan

The Plan describe the actions facility personnel must take to comply in the implementation of the Contingency Plan. This Plan must be updated for the Emergency and Alternate Coordinator names. It does not contain the evacuation Plan. Therefore, is not in compliance with this section.

265.53/207 (2) - Copies of Contingency Plan

Copies of the Contingency Plan were available during the inspection.

265.54 a/803 E - Amendments of Contingency Plan

The Contingency Plan is under provision by the Emergency Coordinator.

265.55/803 E (1) - Emergency Coordinator

At the time of the inspection the emergency coordinator was present.

265.56/803 E (2) - Emergency Procedures

Written emergency procedures, were shown to the inspector.

Subpart G - Closure

265.11 - 265.115/ 805 - General

The Plan describes how and when the facility will be partially closed. It has an estimate of the maximum inventory of wastes in tanks containers and for the incinerator during the life of the facility and a cost estimate.

Subpart H - Financial Requirements

265.142/806 - General

It is under E.Q.B. evaluation.

Subpart I - Use and Management of Containers

265.171/812 C (1) (2) (4) - Condition of Containers

Drums stored were found in good conditions at the moment of the inspection. No leaks were observed the drums. Were stored over wooden pallets and covered. The following wastes were found at the time of the inspection:

<u>No. of Drums</u>	<u>Waste</u>	<u>Date generated</u>
46	Methanol/Acetone	6/6/86
23	Mercury, Silver, Lead	1985

265.172/812 C (4) - Compatibility of Waste with Containers

Containers stored in Eli Lilly appear to be compatible with the hazardous waste stored. No signs of reaction were observed.

265.173/812 D (1) (2) - Management of Containers

Containers holding hazardous waste were closed at the moment of the inspection.

265.174/812 E - Inspections

Eli Lilly Ind., Inc., personnel inspect the storage facility according to their inspection schedule (weekly) in compliance with this section.



265.176/812 B (5) - Special Requirements for Ignitable or Reactive Waste

The containers holding ignitable waste are located at more than 50 feet from the facility's property line.

265.177/812 D (3) - Special Requirements for Incompatible Wastes

This section is not applicable to Eli Lilly since none of the waste stored at this facility are incompatible.

STATE REQUIREMENTS

SR - 502 (A) - Hazardous Waste Generation Records

Eli Lilly Ind., Inc., has records of all hazardous wastes generated.

Subpart J - Tanks

265.192/813 B - General Operating Requirements

Eli Lilly maintains evidence of general operating requirements of past, present, or risk of future leaks.

265.194/813 C - Inspections

The tanks (3) are inspected for discharge control equipment, monitoring equipment, level of waste in tank, construction of materials of the tanks. The tanks and surrounding areas (e.g. dike) are inspected weekly for leaks, corrosion or other failures.

265.197/813 E - Closure

At closure, all HW will be removed from tanks, discharge control equipment and discharge confinement structures.

265.198/813 F - Special Requirements for Ignitable or Reactive Wastes

Does not apply.



CONCLUSIONS AND RECOMMENDATIONS

At the moment of the inspection some deficiencies were found at Eli Lilly Industries, Inc., According to the requirements stated in the Regulation for the Control of Hazardous and Non-Hazardous Solid Waste, amended version and the Federal Regulation 40 CFR, Part 265.

Thrity (30) calendar days will be granted to the company to submit the remedial actions taken of correct the deficiencies found.

LIST OF DEFICIENCIES

Eli Lilly Industries, Inc.

1. Rule 808 (C) of RCHNSW and 40 CFR 265.16 (d)

These rules require that a Hazardous Waste Generator must developed a training Program. This program must include, at least, instructions which teaches facility personnel the hazardous waste management procedures and must be designed to ensure that the personnel is able to respond effectively to emergencies. Annual reviews of the training must be conducted and written evidence must be kept. At the time of the inspection it was found that company has not developed training program yet (written evidence).

2. Rule 810 (G) of RCHNSW and 40 CFR 265.37

This rule requires that copy of the Contingency Plan must be submitted to the local agencies (Police, Fire Department, Hospital, Civil Defense, etc.). At the time of the inspection evidence of this was not showned.

3. Rule 207 of RCHNSW and 40 CFR 265.72

This rule requires that the owner or operator has already prepared an emergency or Contingency Plan for the hazardous waste management, sufficient to comply with the requirements of the H.W. Regulation. At the time of the inspection the Emergency Coordinator and Emergency Alternate were not indicated in the Contingency Plan.

4. Rule 803 D of RCHNSW and 40 CFR 265.14

Require a sign with the legend, "Danger - Unauthorized Personnel Keep Out" must be posted at each entrance to the active portion, in sufficient numbers to be seen from any approach to the active portion and must be legible from a distance of at least 25 feet. At the time of the inspection the signs were found deteriorated.



COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

Environmental  
Quality Board

August 14, 1986

Mr. José J. Rivera  
Engineering Manager  
Eli Lilly Industries, Inc.  
P. O. Box 1748  
Mayaguez, Puerto Rico 00708

Dear Mr. Rivera:

Reference is made to the Full RCRA Generator and TSD Facility Inspection performed to your company on June 30, 1986.

During the inspection, several deficiencies to the requirements of the Regulation for the Control of Hazardous and Non-Hazardous Solid Wastes and Federal Regulation, 40 CFR Parts 262 and 265 were found. Enclosed, please find the list of deficiencies.

It is requested that within thirty (30) calendar days of the receipt of this letter, your company send a letter, to this office outlining the remedial actions taken to correct the deficiencies found (Class II Violations).

If you have any questions about this matter, please contact Ms. Damaris Maldonado, of my staff at: (809) 722-0437.

Cordially yours,

Carlos R. Vázquez Ayala  
Director  
Land Pollution Control Area

CRVA/smm